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Plaintiffs for the 22 States*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST
Case No. 4:13-cv-03234-JST

MDL No. 1917

This Document Relates to:

Indirect Purchaser Actions for the 22 States

**DECLARATION OF LAUREN C.
CAPURRO IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
ADMINISTRATIVE MOTION
PURSUANT TO L.R. 7-11 FOR LEAVE
TO EXCEED PAGE LIMIT**

Judge: Hon. Jon S. Tigar

1 I, Lauren C. Capurro, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice
3 before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott, LLP and my
4 firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned
5 action. I submit this declaration in support of IPPs’ Administrative Motion Pursuant to L.R. 7-11 for
6 Leave to Exceed Page Limit (“Administrative Motion”). I have personal knowledge of the facts stated
7 herein, and I could and would competently testify thereto if called as a witness.

8 2. IPPs are filing a Motion Pursuant to Ninth Circuit’s Mandate to Reconsider and Amend
9 Final Approval Order, Final Judgment and Fee Order (ECF Nos. 4712, 4717, 4740) (“Motion”).

10 3. IPPs’ Motion is related to the limited amendments to the settlements that have been
11 executed between the 22 Indirect Purchaser State Classes and the seven defendants, addressing the
12 concerns expressed by the Ninth Circuit and this Court.

13 4. My colleagues and I have attempted to limit the length of the brief without sacrificing
14 clarity and/or our ability to address the factual and legal issues supporting the Motion. However, due
15 to the number of factual and legal issues needing to be addressed, we have been unable to reduce the
16 number of pages to 25.

17 5. In my opinion, based on the work I have done on the Motion, and my knowledge of this
18 case having worked on it for over ten years, an additional seven pages are necessary to fully address
19 the factual and legal issues set forth in the brief.

20 6. Defendants have informed me that they have no objection to this motion.
21

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on
23 September 16, 2019, in San Francisco, California.

24
25 /s/ Lauren C. Capurro
26 Lauren C. Capurro
27
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